

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,<sup>1</sup>

Debtors

Chapter 11

Case No. 19-12378-KBO

Jointly Administered

Ref. Docket No. 972

Hearing Date: May 12, 2020 at 1:00 p.m. (ET)

**NOTICE OF FILING OF  
PUBLIC VERSION OF ZOHAR LENDERS' RESERVATION OF RIGHTS  
REGARDING DEBTORS' ENTRY INTO SALE AGREEMENTS UNDER SEAL**

TO: (I) COUNSEL TO THE DEBTORS; (II) THE OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (III) COUNSEL TO THE DIP LENDER; (IV) COUNSEL TO THE COMMITTEE; (V) COUNSEL TO THE PREPETITION ABL PARTIES; (VI) COUNSEL TO THE INITIAL DIP LENDER; AND (VII) ALL PARTIES THAT HAVE FILED A NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that on May 8, 2020, Zohar II 2005-1, Limited ("Zohar II") and Zohar III, Limited ("Zohar III," and together with Zohar II, the "Zohar Lenders") filed the *Zohar Lenders' Reservation of Rights Regarding Debtors' Entry Into Sale Agreements* [Docket No. 972] (the "Reservation of Rights") under seal.

**PLEASE TAKE FURTHER NOTICE** that the Zohar Lenders hereby file the public version of Reservation of Rights, attached hereto as **Exhibit A**.

---

<sup>1</sup> The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693).

Dated: May 11, 2020  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Shane M. Reil

James L. Patton, Jr. (No. 2202)

Robert S. Brady (No. 2847)

Michael R. Nestor (No. 3526)

Joseph M. Barry (No. 4221)

Ryan M. Bartley (No. 4985)

Shane M. Reil (No. 6195)

Rodney Square

1000 North King Street

Wilmington, Delaware 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Email: jpatton@ycst.com

rbrady@ycst.com

mnestor@ycst.com

jbarry@ycst.com

rbartley@ycst.com

sreil@ycst.com

*Counsel to the Zohar Lenders*